

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ROTHSCHILD CONNECTED
DEVICES INNOVATIONS, LLC,

Plaintiff,

v.

THE COCA-COLA COMPANY,

Defendant.

Civil Action No. 1:16-cv-01241-TWT

**STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT OF
DEFENDANT THE COCA-COLA COMPANY'S
MOTION FOR SUMMARY JUDGMENT**

I. PARTIES

A. Rothschild Connective Devices Innovations, LLC

1. Plaintiff Rothschild Connected Devices Innovations, LLC ("RCDI") is a Texas limited liability company with its standard place of business at 1400 Preston Rd., Suite 400, Plano TX 75093 (Texas Office of the Comptroller Franchise Tax Account Status for Rothschild Connected Devices Innovations, LLC (Ex. 1 at RCDI000711)).
2. RCDI was formed on December 18, 2014 (*id.*) and as of January 25th, 2017, became the exclusive licensee of U.S. Patent No. 8,417,377 ("the '377 Patent") (Assignment of Patent Rights between Leigh M. Rothschild and Rothschild Connected Devices Innovations, LLC (Ex. 2 at RCDI000765-768)).
3. Mr. Leigh Rothschild is the manager of RCDI and he resides in Miami-Dade County, Florida (D.I. 1 at ¶1; Officers and Directors Info of Rothschild Connected Devices Innovations, LLC (Ex. 3 at RCDI0000712)).